

EXHIBIT 1

From: Sheasby, Jason
Sent: Monday, December 4, 2023 4:23 PM
To: Park, Ryuk; #Netlist-Micron [Int]; Jennifer Truelove (jtruelove@McKoolSmith.com); ~Baxter, Samuel
Cc: Winston-Micron-Netlist; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com
Subject: Re: Netlist v. Micron, 22-cv-203 | claw-back under PO Para. 12

Also, there is no privilege between you and an expert. In fact, sending information to an expert definitively waives privilege. Why don't we discuss this on a lead to lead meet and confer.

Thanks
JS

From: Jason Sheasby <JSheasby@irell.com>
Date: Monday, December 4, 2023 at 4:04 PM
To: "Park, Ryuk" <RPark@winston.com>, "#Netlist-Micron [Int]" <Netlist-Micron@irell.com>, "Jennifer Truelove (jtruelove@McKoolSmith.com)" <jtruelove@mckoolsmith.com>, "~Baxter, Samuel" <sbaxter@mckoolsmith.com>
Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>, "andrea@wsfirm.com" <andrea@wsfirm.com>, "ce@wsfirm.com" <ce@wsfirm.com>, "wh@wsfirm.com" <wh@wsfirm.com>
Subject: Re: Netlist v. Micron, 22-cv-203 | claw-back under PO Para. 12

Ryuk:

We have a problem. All of our experts have already analyzed and based their opinions on the original Appendix 1. They cannot unlearn what is in there and cannot un-rely on it.

From: "Park, Ryuk" <RPark@winston.com>
Date: Monday, December 4, 2023 at 3:59 PM
To: "#Netlist-Micron [Int]" <Netlist-Micron@irell.com>, "Jennifer Truelove (jtruelove@McKoolSmith.com)" <jtruelove@mckoolsmith.com>, "~Baxter, Samuel" <sbaxter@mckoolsmith.com>
Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>, "andrea@wsfirm.com" <andrea@wsfirm.com>, "ce@wsfirm.com" <ce@wsfirm.com>, "wh@wsfirm.com" <wh@wsfirm.com>
Subject: RE: Netlist v. Micron, 22-cv-203 | claw-back under PO Para. 12

Counsel,

The original Appendix 1 to Dr. Woods's Opening Report inadvertently included privileged information. Pursuant to paragraph 12 of the Protective Order, please immediately cease any use of the original Appendix 1, take reasonable steps to retrieve all copies of the original Appendix 1, and confirm within 5 business days that all copies have been destroyed.

A corrected copy of Appendix 1 was served along with Dr. Woods's Rebuttal Report.

Regards,

Ryuk

Ryuk Park

Of Counsel

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